

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Tri Fund Development LLC Case No. 15-4492 Chapter 11

All Cases: Moving Creditor Urban Partnership Bank Date Case Filed 2/11/2015

Nature of Relief Sought: Lift Stay Annul Stay Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. Home
 - b. Car Year, Make, and Model _____
 - c. Other (describe) Real estate not owned by Debtor
2. Balance Owed as of Petition Date \$ 1,784,003.25
Total of all other Liens against Collateral \$ 0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 103,000
5. Default
 - a. Pre-Petition Default
Number of months 36 Amount \$ \$1,784,003.25
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. Lack of Adequate Protection § 362(d)(1)
 - i. No insurance
 - ii. Taxes unpaid Amount \$ _____
 - iii. Rapidly depreciating asset
 - iv. Other (describe) _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. Other “Cause” § 362(d)(1)
 - i. Bad Faith (describe) _____
 - ii. Multiple Filings
 - iii. Other (describe) _____
 - d. Debtor’s Statement of Intention regarding the Collateral
 - i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention Filed

Date: 3/11/2015 /s/ Patrick M. Jones
Counsel for Movant